ecology and environment, inc.
International Specialists in the Environment

720 Third Avenue, Suite 1700
Seattle, Washington 98104
Tel: (206) 624-9537, Fax: (206) 621-9832

January 10, 2011

Earl Liverman, On-Scene Coordinator
United States Environmental Protection Agency
Coeur d'Alene Field Office
1910 Northwest Boulevard, Suite 208
Coeur d'Alene, ID 83814

Re: Trip Report for the Riverview Construction Asbestos Site
Contract Number EP-S7-06-02, Technical Direction Document Number 10-08-0001

Dear Mr. Liverman:

Enclosed please find the Trip Report for the Riverview Construction Asbestos Site, in Orofino, Idaho. If you have any question regarding this submittal, please call Daniel Wright at (206) 624-9537 or me at (206) 920-1739.

Sincerely,

ECOLOGY AND ENVIRONMENT, INC.

Steven G. Hall
START-3 Project Leader

cc: Daniel Wright, START-3 Project Manager, E & E, Seattle, Washington

TRIP REPORT

Riverview Construction Asbestos Site
Orofino, Idaho
TDD: 10-08-0001

U.S. Environmental Protection Agency, Region 10
Coeur d'Alene Field Office 1910 Northwest Boulevard, Suite 208,
Coeur d'Alene, ID 83814

Prepared by

Ecology and Environment, Inc.
720 Third Avenue, Suite 1700
Seattle, Washington 98104

January 2011

Executive Summary

Ecology and Environment, Inc., (E & E) was tasked by the United States Environmental Protection Agency (EPA) to provide technical support for the completion of a removal assessment at the Riverview Construction Asbestos Site (Site), located at 12976 U.S. Highway 12, Orofino, Clearwater County, ID 83544. E & E completed the removal assessment activities under Technical Direction Document Number 10-08-0001, which is issued under EPA, Region 10, Superfund Technical Assessment and Response Team (START) contract number EP-S7-06-02.

In May 2010, a complaint was received by the EPA regarding the placement of excavated soil containing asbestos cement pipe (ACP) at a vacant lot located in Orofino, Clearwater County, Idaho. On 29 June 2010, On-Scene Coordinator Earl Liverman collected three random grab samples of suspected ACP from the vacant lot. The three samples were analyzed using Polarized Light Microscopy analysis to determine asbestiform variety and percent concentration. The data showed asbestos concentrations of 8%, 9%, and 9% chrysotile mineral fibers.

1. PLACE VISITED

Site Name: Riverview Construction Asbestos Site
Owner Name: Riverview Construction Co.; partners (b) (6) and (b) (6)
Location: 12976 U.S. Highway 12, Orofino, Clearwater County, ID 83544
SSID: 10JG **CERCLIS ID:** IDN001002878
Latitude: 46º29'55.56"N **Longitude:** 116º19'04.20"W
Date of Trip: 29 June 2010

2. PURPOSE

The United States Environmental Protection Agency (EPA) has tasked Ecology and Environment, Inc. (E & E), under Superfund Technical Assessment and Response Team (START) contract number EP-S7-06-02, Technical Direction Document number 10-08-0001, to provide technical assistance, sampling support, and written documentation. See Figure 1 for the Site Map.

The purpose of the visit was to investigate a complaint received by EPA regarding the placement of excavated soil containing asbestos cement pipe (ACP) at a vacant lot in the City of Orofino, Clearwater County, Idaho.

3. PERSONS INVOLVED

Agency/Company	Contact Persons/Position	Phone Number
United States Environmental Protection Agency	Earl Liverman - On-Scene Coordinator	208.664.4858
Riverview Construction	(b) (6) - Property Owner	(b) (6)

4. BACKGROUND

In May 2010, a complaint was received by the EPA regarding the placement of excavated soil containing ACP at a vacant lot in the City of Orofino, Clearwater County, Idaho. The complainant alleged that in 2009, the Riverside Water and Sewer District (District) in the City of Orofino awarded a contract to Owyhee Construction, Inc. (Owyhee) for the construction of waterline improvements for the District, and that Owyhee placed excavated soil containing ACP as fill material on a vacant lot in the City.

In response to the complaint, EPA On-Scene Coordinator (OSC) Earl Liverman met with the complainant at the vacant lot on 25 June 2010. OSC Liverman observed many scattered pieces of suspected ACP laying on the ground surface. The sizes ranged from 2 to 3 inches in length and width to greater than 6 inches in length and 3 to 4 inches in width. All ACP pieces appeared weathered, the edges were crumbled, and potential asbestos fibers were observed at the edges.

5. ACTIVITIES

On behalf of Riverview Construction, (b) (6) granted OSC Liverman entry and access to the Site on 28 June 2010. OSC Liverman returned to the Site on 29 June 2010 and collected three random grab samples of suspected ACP in accordance with a Site Specific Sampling Plan and Quality Assurance Plan.

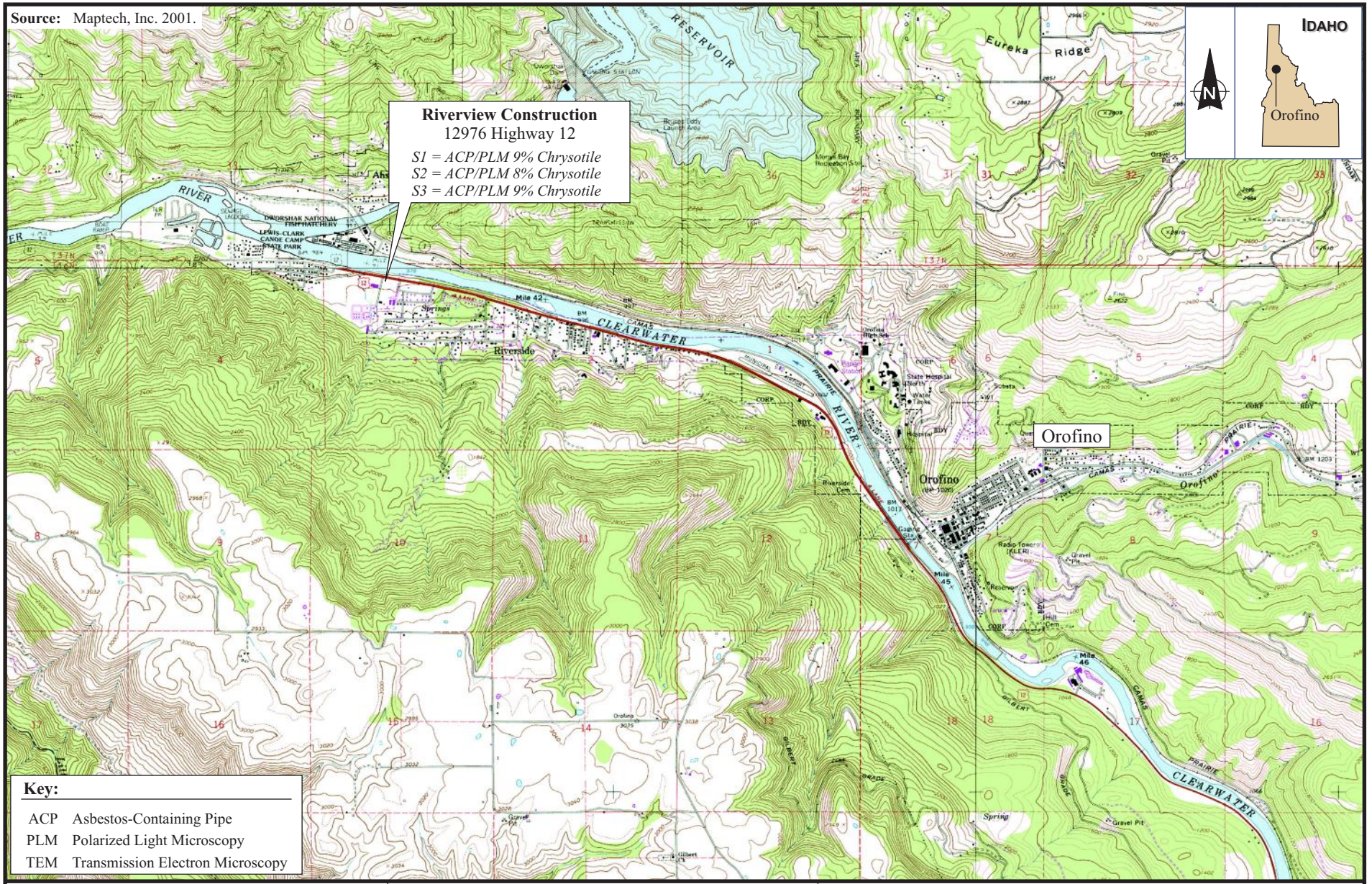
Refer to Attachment A for Photo Documentation, Appendix B for the Laboratory Analysis Report, and Appendix C for the Data Quality Assurance Review Memorandum.

6. SUMMARY

The three samples collected on 29 June 2010 were analyzed using Polarized Light Microscopy (PLM) analysis to determine asbestiform variety and percent concentration. The data showed asbestos concentrations of 8%, 9%, and 9% chrysotile mineral fibers.

Figure 1

Site Map



ecology and environment, inc.
International Specialists in the Environment
Seattle, Washington

RIVERVIEW CONSTRUCTION
Orofino, Idaho

0 2000 4000
Approximate Scale in Feet

Figure 1
SITE LOCATION MAP

Date:	Drawn by:	
11/9/10	AES	10:START-3\10080001\fig 1

ATTACHMENT A

Photo Documentation

Photo 1 Exposed ACP in ground.

Direction: *Down* *Date: 6/29/10*

Photo 2 Exposed ACP in ground.

Direction: *Down* *Date: 6/29/10*

Photo 3 Exposed ACP in ground.

Direction: *Down* *Date: 6/29/10*

Photo 4 Riverview construction site overview.

Direction: *Southeast* *Date: 6/29/10*

ATTACHMENT B

Laboratory Analysis Report

Lab/Cor, Inc.
7619 6th Ave NW
Seattle, WA 98117

Analysis Report Cover

Final Report

A Professional Service Corporation in the Northwest

Phone: (206) 781-0155
Fax: (206) 789-8424
http://www.labcor.net

Job Number: 100822 **SEA**

Report Number: 100822R01

Client: Ecology & Environment

Report Date: 7/1/2010

Address: 720 3rd Ave
Suite 1700
Seattle, WA 98104

Project Name:

Project Num: 10GQ-06/29/10-0007

PO Number:

Sub Project:

Enclosed please find results for samples submitted to our laboratory. A list of samples and analyses follows:

Lab/Cor Sample #	Client Sample # and Description	Analysis	Analysis Notes	Date Received:
100822 - S1	10061001 - VL01PI01	PLM - (subcontracted)		6/30/2010
100822 - S2	10061002 - VL01PI02	PLM - (subcontracted)		6/30/2010
100822 - S3	10061003 - VL01PI03	PLM - (subcontracted)		6/30/2010

PLM - (subcontracted) - EPA 600-R-93-116: Bulk sample analysis was performed by a NVLAP-accredited laboratory for bulk asbestos analysis using PLM. The examination was performed using the EPA Polarized Light Microscopy method 40 CFR Part 763, Subpart E, Appendix E. This report contains data which were produced by a subcontracted laboratory accredited by NVLAP for the testing of asbestos in bulk building materials.

Disclaimer: The results reported relate only to the samples tested or analyzed. Interpretation of these results is the sole responsibility of the client.

If further clarification of these results is needed, please call us. Thank you for allowing the staff at Lab/Cor, Inc. the opportunity to provide you with the analytical services.

Sincerely,

x

Kate March
Analyst

Lab/Cor Portland, Inc.
4321 SW Corbett Ave., Ste A
Portland, OR 97239

BULK SAMPLE ASBESTOS ANALYSIS

Asbestos and Environmental Analysis

Phone: (503) 224-5055
Fax: (503) 228-8282
http://www.labcorpdx.net

Client: Lab/Cor, Inc.
7619 6th Ave NW
Seattle, WA 98117

Job Number: 101295
Project Name:
Project Number: 10GQ-06/29/10-0007
Project Notes:

Report Number: 101295R01
Report Date: 06/30/2010
P.O. No: n/a

Client Sample ID: 10061001 **Sample ID:** S1 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI01 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	9 %	-	-	9 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	91 %

Client Sample ID: 10061002 **Sample ID:** S2 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI02 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	8 %	-	Trace	8 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	92 %

Client Sample ID: 10061003 **Sample ID:** S3 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI03 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	9 %	-	-	9 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	91 %

NVLAP

LabCor Portland Inc
Lab/Cor Portland, Inc.
4321 SW Corbett Ave., Ste A
Portland, OR 97239

BULK SAMPLE ASBESTOS ANALYSIS

Asbestos and Environmental Analysis

Phone: (503) 224-5055
Fax: (503) 228-8282
http://www.labcorpdx.net

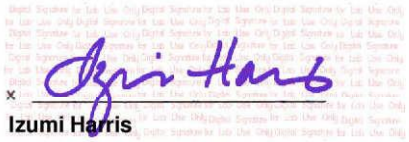
Job Number: 101295

Report Number: 101295R01
Report Date: 06/30/2010

This laboratory participates in the National Voluntary Laboratory Accreditation Program (NVLAP).
Testing method is per 40 CFR 763 Subpart F, Appendix A, PLM.

Layered samples are considered non-homogeneous."Misc" is miscellaneous. "NAD" is No Asbestos Detected.
Asbestos consists of the following minerals: chrysotile, amosite, crocidolite, tremolite, actinolite, anthophyllite.
Small diameter fibers such as those found in vinyl floor tiles, may not be detected by PLM.
Asbestos detection interferences may result from material binders.
Qualitative and quantitative TEM analysis may be recommended for difficult samples.
Quantitative analysis by PLM point count or TEM is recommended for samples testing at < or = to 1% asbestos.
The following estimate of error for this method by visual estimation of asbestos percent are as follows:
1% asbestos: 0-3% error, 5% asbestos: 1-9% error, 10% asbestos: 5-15% error, 20% asbestos: 10-30% error.
This report pertains only to the samples listed on the report. Report considered valid only when signed by analyst.

Reviewed by:



Izumi Harris
Analyst

NVLAP

ATTACHMENT C

Data Quality Assurance Review Memorandum

ecology and environment, inc.
International Specialists in the Environment
720 Third Avenue, Suite 1700, Seattle, WA 98104
Tel: (206) 624-9537, Fax: (206) 621-9832

MEMORANDUM

DATE: July 2, 2010

FROM: Mark Woodke, START-3 Chemist, E & E, Seattle, WA

SUBJ: **Data Quality Assurance Review, Owyhee Construction Site, Orofino, Idaho**

REF: TDD: 09-12-0007 PAN: 002233.0517.SGTG

The data quality assurance review of 3 pipe samples collected from the Owyhee Construction site in Owyhee, Idaho, has been completed. Polarized light microscopy (PLM) asbestos analyses were performed by Lab/Cor Portland, Inc., Portland, Oregon.

The samples were numbered: 10061001 10061002 10061003

Data Qualifications:

The samples were collected on June 29, 2010, were received at the laboratory on June 30, 2010, and were analyzed by June 30, 2010. No discrepancies were noted in the laboratory case narrative.

The overall usefulness of the data is based on the criteria outlined in the Site-Specific Sampling Plan, the OSWER Guidance Document "Quality Assurance/Quality Control Guidance for Removal Activities, Sampling QA/QC Plan, and Data Validation Procedures" (EPA/540/G-90/004), and the analytical method. Based upon the information provided, the data are acceptable for use with the above stated data qualifications.

Data Qualifiers and Definitions

J - The associated numerical value is an estimated quantity because the reported concentrations were less than the sample detection limits but greater than the instrument detection limits or because quality control criteria limits were not met.

U - The material was analyzed for but was not detected. The associated numerical value is the sample quantitation limit.

UJ - The material was analyzed for, but not detected. The reported detection limit is estimated because quality control criteria were not met.

Lab/Cor, Inc.
7619 6th Ave NW
Seattle, WA 98117

Analysis Report Cover

Final Report

A Professional Service Corporation in the Northwest

Phone: (206) 781-0155
Fax: (206) 789-8424
http://www.labcor.net

Job Number: 100822 SEA
Client: Ecology & Environment
Address: 720 3rd Ave
Suite 1700
Seattle, WA 98104
Project Name:
Project Num: 10GQ-06/29/10-0007
PO Number:
Sub Project:

Report Number: 100822R01
Report Date: 7/1/2010

Enclosed please find results for samples submitted to our laboratory. A list of samples and analyses follows:

Lab/Cor Sample #	Client Sample # and Description	Analysis	Analysis Notes	Date Received:
100822 - S1	10051001 - VL01PI01	PLM - (subcontracted)		6/30/2010
100822 - S2	10061002 - VL01PI02	PLM - (subcontracted)		6/30/2010
100822 - S3	10061003 - VL01PI03	PLM - (subcontracted)		6/30/2010

PLM - (subcontracted) - EPA 600-R-93-116: Bulk sample analysis was performed by a NVLAP-accredited laboratory for bulk asbestos analysis using PLM. The examination was performed using the EPA Polarized Light Microscopy method 40 CFR Part 763, Subpart E, Appendix E. This report contains data which were produced by a subcontracted laboratory accredited by NVLAP for the testing of asbestos in bulk building materials.

Disclaimer: The results reported relate only to the samples tested or analyzed. Interpretation of these results is the sole responsibility of the client.

If further clarification of these results is needed, please call us. Thank you for allowing the staff at Lab/Cor, Inc. the opportunity to provide you with the analytical services.

Sincerely,

x _____

Kate March
Analyst

MW-210

LabCor Portland Inc **Lab/Cor Portland, Inc.**
4321 SW Corbett Ave., Ste A
Portland, OR 97239

BULK SAMPLE ASBESTOS ANALYSIS

Asbestos and Environmental Analysis

Phone: (503) 224-5055
Fax: (503) 228-8282
http://www.labcorpdx.net

Client: Lab/Cor, Inc.
7619 6th Ave NW
Seattle, WA 98117

Report Number: 101295R01
Report Date: 06/30/2010

Job Number: 101295
Project Name:
Project Number: 10GO-06/29/10-0007
Project Notes:

P.O. No: n/a

Client Sample ID: 10061001 **Sample ID:** S1 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI01 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	9 %	-	-	9 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	91 %

Client Sample ID: 10061002 **Sample ID:** S2 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI02 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	8 %	-	Trace	8 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	92 %

Client Sample ID: 10061003 **Sample ID:** S3 **Date Analyzed:** 06/30/2010
Client Sample Description: VL01PI03 **Analyst:** Izumi Harris

Asbestos Mineral Fibers	Layer Percent:	Chrysotile	Amosite	Crocidolite	Percent Asbestos:
Homogeneous					
cementitious material, gray	100 %	9 %	-	-	9 %

Other Fibers	Fibrous Glass	Cellulose	Mineral Wool	Synthetic	Other	Matrix
	-	-	-	-	-	91 %

MW7-20

NVLAP

LabCor Portland Inc **Lab/Cor Portland, Inc.**
4321 SW Corbett Ave., Ste A
Portland, OR 97239

BULK SAMPLE ASBESTOS ANALYSIS

Asbestos and Environmental Analysis

Phone: (503) 224-5056
Fax: (503) 228-8282
http://www.labcorpdx.net

Job Number: 101295

Report Number: 101295R01
Report Date: 06/30/2010

This laboratory participates in the National Voluntary Laboratory Accreditation Program (NVLAP).
Testing method is per 40 CFR 763 Subpart F, Appendix A, PLM.

Layered samples are considered non-homogeneous."Misc" is miscellaneous. "NAD" is No Asbestos Detected.
Asbestos consists of the following minerals: chrysotile, amosite, crocidolite, tremolite, actinolite, anthophyllite.
Small diameter fibers such as those found in vinyl floor tiles, may not be detected by PLM.
Asbestos detection interferences may result from material binders.
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Quantitative analysis by PLM point count or TEM is recommended for samples testing at < or = to 1% asbestos.
The following estimate of error for this method by visual estimation of asbestos percent are as follows:
1% asbestos: 0-3% error, 5% asbestos: 1-9% error, 10% asbestos: 5-15% error, 20% asbestos: 10-30% error.
This report pertains only to the samples listed on the report. Report considered valid only when signed by analyst.

Reviewed by:

x Izumi Harris

Izumi Harris
Analyst

NVLAP